
**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF UTAH**

UNITED STATES OF AMERICA,

Plaintiff,

v.

AARON MICHAEL SHAMO, et. al.,

Defendant.

**(PROPOSED) STIPULATED
PRETRIAL ORDER**

Case No. 2:16-CR-00631 DAK

Judge Dale A. Kimball

A final pretrial conference and pre-admission hearing is scheduled for the above-listed matter on January 09, 2019, through January 11, 2019. This case is set for a 3-week trial to begin on January 22, 2019, at 8:00 a.m.

Counsel are instructed as follows:

1. **Court Imposed Deadlines.** None of the dates herein may be altered by stipulation of the parties without the further order of the Court and good cause shown. The dates herein specifically correspond to the current trial date of January 22, 2019.
2. **Witness and Exhibit Lists.** The parties shall exchange complete Witness and Exhibit Lists by November 26, 2018.
3. **Expert Witness Notice.** The parties shall exchange all Notice of Experts by November 26, 2018.
4. **Discovery.** The Government must finalize and produce all outstanding discovery by November 19, 2018. This duty to produce all outstanding discovery excludes production of any and all *Brady/Giglio* material, which shall be due December 8, 2018.

5. **Pretrial Motions.** All pretrial motions must be fully briefed by January 2, 2019, so the Court may address them at the Pre-admission Hearing currently scheduled for January 9-11, 2019. This includes any Speedy Trial Act Motions. As such, initial motions are due December 15, 2018. Memoranda in opposition are due December 29, 2018. Reply memoranda are due January 2, 2018.

6. **Jury Instructions.** The parties shall exchange proposed Jury Instructions by January 2, 2019. The parties should then confer in order to agree on a single set of instructions to the extent possible.

7. **Verdict Form.** The parties shall exchange proposed Verdict Forms by January 2, 2019. The parties should then confer in an attempt to agree on a single set of Proposed Verdict Forms.

8. **Pretrial Submissions.** The parties shall submit the following to the Court:

- a. Jury Pool Survey Questionnaire. The parties shall submit to the Court requested survey questions to be sent to the pool of prospective jurors by November 21, 2018.
- b. Proposed Jury Instructions. The parties shall submit a single set of joint proposed jury instructions to the Court by January 7, 2019. The parties shall each submit a set of proposed jury instructions for any instructions not stipulated to as well as any objections to the other party's proposed jury instructions to the Court by January 7, 2019.
- c. Proposed *Voir Dire* Questions. The parties shall submit proposed *Voir Dire* Questions to the Court by January 7, 2019.
- d. Proposed Verdict Form. The parties shall submit a single set of joint proposed verdict forms to the Court by January 7, 2019. The parties shall each submit a set of proposed verdict forms for any forms not stipulated to as well as any objections to the other party's proposed verdict forms to the Court by January 7, 2019.

DATED this ____ day of October, 2018.

BY THE COURT

Dale A. Kimball
United States District Court Judge